

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	No. CR19-159-RSL
Plaintiff,)	
v.)	MS. THOMPSON'S PROPOSED
PAIGE A. THOMPSON,)	JURY QUESTIONNAIRE
Defendant.)	ADDITION AND VOIR DIRE, AND
)	RESPONSE TO GOVERNMENT'S
)	PROPOSED VOIR DIRE

Paige Thompson, through counsel, submits the following: (1) a proposed addition to the jury questionnaire distributed by the Clerk of the Court; (2) proposed voir dire; and (3) responses to the government's proposed examination of prospective jurors.

Overall the defense respectfully requests that the Court pursue more detailed questioning if a juror's answers reveal such inquiry is needed to ensure that person can be a fair and impartial juror.

Jury Questionnaire

The defense proposes the jury questionnaire the Clerk of the Court distributes to prospective jurors include the following addition:

Paige Thompson, the defendant in this case is transgender. At birth, Ms. Thompson was identified as male. Currently, she identifies as a woman. Is there anything about a transgender person that would affect your ability to fairly and impartially consider the evidence and reach a verdict?

Defendant's Proposed Voir Dire

The defense proposes the following questions be included in voir dire of potential jurors:

1. Paige Thompson is transgender. At birth, Ms. Thompson was identified as male. Currently, Ms. Thompson identifies as a woman. Is there anything about a transgender person that would affect your ability to fairly and impartially consider the evidence and reach a verdict?

[This is so important that it should be in both the questionnaire and asked again during voir dire.]

2. Some of the evidence in this trial may relate to cryptocurrency like Bitcoin and Ether. Do you have any views regarding, or experience with, cryptocurrency that would hinder or prevent you from rendering a fair and impartial verdict? Have you seen, heard, or read anything about cryptocurrencies like Bitcoin and Ether? If so, what? Do you have any personal experience with cryptocurrency? If so, what?
3. Some of the evidence in this trial may be presented in the form of testimony from FBI agents or other government officials about statements that the government contends Ms. Thompson made to law enforcement. Do you have any feelings or opinions about the use of such alleged statements that could affect your ability to be fair and impartial in this case?

Response to Government's Proposed Voir Dire

The defense's edits to the government's proposed voir dire are highlighted in yellow, with additions bolded and deletions struck through (e.g., **addition**, and ~~deletion~~). Following the edits, explanations for deletions and additions are provided in italicized brackets (e.g., *[explanation]*).

25. This case involves an **alleged** breach of Capital One's computers, and those of other Amazon Web Services clients, in 2019. Certain aspects of this case were reported in the media, including television news and newspapers. Have any of you watched or read anything about this case?

[This is an allegation.]

30. Have any of you had any dealings with the law firm Waymaker, LLP or the Federal Public Defender's Office?

[Both entities represent Ms. Thompson.]

38. Since 2019, have you received any notice from any bank or other company that your personal identifying information being publicly available has been stolen or otherwise compromised?

[Without this change, it implies the information in this case was stolen or compromised, which is simply an allegation.]

40. Have you ever used or mined bitcoin, Ether, monero, or any other type of cryptocurrency?

[The defense believes its more detailed questions about cryptocurrency above should be used, but it notes that this questions does not account for the fact that allegations here focus on mining, not use.]

DATED May 27, 2022.

Respectfully submitted,

/s/ Mohammad Ali Hamoudi

MOHAMMAD ALI HAMOUDI

/s/ Christopher Sanders

CHRISTOPHER SANDERS

/s/ Nancy Tenney

NANCY TENNEY

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/s/ Brian Klein

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